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March 31, 2021

ECF

Honorable Edward R. Korman
United States Magistrate Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Mahmoud v. Akima Global Services LLC, et al.*
1:21-cv-00013-ERK-CLP

Dear Judge Korman:

Our office represents Akima Global Services, LLC, ("Akima") as well as Akima's employees named in the above referenced matter: Detention Officers Vohwinkel, Heritage, Torres, O'Neil, Smith, Heritage, Kowalski, Spiotta, Kowalski, and Scimia (collectively with Akima, the "Akima Defendants").

The undersigned submits this letter to advise the Court of a proposed briefing schedule for the Akima Defendants' anticipated motion for summary judgment, pursuant to Your Honor's Individual Motion Practices. As of the time of the filing of this letter, plaintiff's counsel has not yet responded to consent or object to the proposed schedule despite our request. Counsel for the federal co-defendants has consented to the proposed schedule.

In the interest of judicial economy and the similarity of the issues presented, the undersigned has proposed a schedule to mirror that proposed by the United States Attorney's Office and approved on March 26 by Your Honor.

The proposed briefing schedule, as presented to counsel, is as follows:

- The Akima Defendants will serve their motion and memorandum of law in support by the end of the day on March 31, 2021;



- Plaintiff's memorandum of law in opposition to the Akima Defendants' motion, if any, to be served by April 21, 2021;
- The Akima Defendants' memorandum of law in reply, if any, to be served by April 30, 2021;
- The Akima Defendants to file the fully briefed motion by May 3, 2021.

We thank the Court for its attention to this matter.

Very truly yours,

LIPPE MATHIAS WEXLER FRIEDMAN LLP

A handwritten signature in blue ink. The first part is a stylized 'D' and 'C' joined together. To the right of the 'C', the name 'Vacco' is written in a cursive script.

Dennis C. Vacco

To: All counsel of record via ECF.